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Appl. No. 10/695,015  
Attorney Docket PT1330USNA  
Amendment/Reply with RCE

**REMARKS/ARGUMENTS**

Claim 1 is pending in this Application. Claim 1 stands rejected. Claims 2-13 have been added. Support for new claim 2 is given at paragraphs [0006], [0034], and [0038] of the published application US 2005/0090681. Support for new claims 3-6 is given at paragraph [0006]. Support for new claim 7 is given at paragraph [0004]. Support for new claim 8 is given at paragraphs [00034] and [0035]; support for new claim 9 is given at paragraph [0039]. Support for new claim 10 is given at paragraph [0043]. Support for new claim 11 is given at paragraphs [0042] and [0043]. Support for new claim 12 is given at paragraph [0007]. Support for new claim 13 is given at paragraph [0008].

The rejection of claim 1 under 35 U.S.C. 103(a) as being unpatentable over Breikss (US Patent No. 5,523,453) is respectfully traversed. Applicants respectfully submit that the Examiner is using impermissible hindsight to make the obviousness rejection.

The Examiner states that Breikss teaches a hydrocyanation process wherein iron chloride and manganese chloride are employed as promoters. The Examiner further states that the source of the promoter(s) is not considered to be a patentable distinction since the same promoters are being used by Breikss. In response, Applicants note that Breikss teaches the use of discrete Lewis Acid compounds, such as iron(II) chloride or manganese(II) chloride, and does not teach or suggest the use of a promoter or a promoter mixture which is a byproduct of a method for producing titanium tetrachloride from titanium ore. As Applicants have previously noted, the byproduct promoter of the current application typically contains iron(II) chloride and manganese(II) chloride as well as other metal chlorides and additional components, such as sand or coke (page 8, lines 19-23 and page 11, lines 4-7). It would not be obvious to one skilled in the art that a promoter obtained as a byproduct of titanium ore chlorination would work in a process for hydrocyanation. One skilled in the art would question whether the byproduct promoter would not contain at least one material which could act as a catalyst poison or produce an otherwise deleterious effect on the desired hydrocyanation chemistry. Without trying the hydrocyanation experiment, it could not be assumed that the crude byproduct of a method for producing titanium tetrachloride from titanium ore would

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contain only desired Lewis Acid promoters and inert materials and that such byproduct promoter could be used successfully in a hydrocyanation process. Applicants respectfully maintain that the obviousness rejection of claim 1 is therefore improper and should be withdrawn.

This response is intended to be a complete reply. Applicants respectfully submit that claims 1-13 are in condition for allowance and request that the Application be allowed.

Applicants would like to thank the Examiner for the attention and consideration accorded the present Application. Should the Examiner determine that any further action is necessary to place the Application in condition for allowance, the Examiner is encouraged to contact the undersigned by telephone. It is not believed that any fees for extensions of time or the like are required beyond those that are otherwise indicated in the documents accompanying this paper. However, if such additional fees are required, please charge or credit the balance to Deposit Account 50-3223 (Invista North America S. à r. l.).

Dated: October 27, 2006

Respectfully submitted,



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